

4 March 2024

ATTENTION: Catherine Van Laeren

Executive Director – Metro West
NSW Department of Planning, Housing and Infrastructure
via: NSW Department of Planning Portal

cc. Anne Skewes
Acting CEO
Western Parkland City Authority
via email: Anne.Skewes@wpca.sydney

RE: BRADFIELD CITY CENTRE MASTERPLAN

Dear Mrs Van Laeren,

The Urban Development Institute of Australia NSW (UDIA) is the state's leading development industry body. We represent the leading participants in the industry and have more than 450 members across the entire spectrum of the industry including developers, financiers, builders, suppliers, architects, contractors, engineers, consultants, academics and state and local government bodies.

UDIA invests in evidence-based research that informs our advocacy to state, federal and local government, so that development policies and critical investment are directed to where they are needed the most. Together with our members, we shape the places where people will live for generations to come and in doing so, we are city shapers. In NSW alone, the property industry creates more than \$581.4 billion in flow on activity, generates around 387,000 jobs and provides around \$61.7 billion in wages and salaries to workers and their families.

UDIA welcome the opportunity to provide feedback to both the Department of Planning and Western Parkland City Authority regarding the draft Bradfield City Masterplan. The draft Bradfield City Centre Master Plan sets out a framework for future development within the city centre of the Western Sydney Aerotropolis as well as further information on the future mixed-use development, road networks, open space and parkland within the city centre.

UDIA understands as part of the master planning process, changes to current planning controls are also required, including the State Environmental Planning Policy (Precincts – Western Parkland City) 2021, Western Sydney Aerotropolis Precinct Plan, and the Western Sydney Aerotropolis Development Control Plan (DCP) – Phase 2.

Since 2014 industry has witnessed significant planning and rezoning announcements, with the Nancy Bird Walton International Airport developing on schedule. However, development in the other 9 precincts across the Aerotropolis is progressing slowly, largely due to uncertainty around the delivery of critical enabling infrastructure. Swathes of rezoned industrial land is still sitting vacant waiting for clarity on when the complex web of new or upgraded roads will be delivered and when the recycled stormwater scheme connecting industrial lands will be completed.

UDIA and our members have identified some areas of concern regarding the current master planning proposal and associated plans, and we stand ready to assist both the Department of Planning, Housing and Infrastructure (DPHI, or the Department) and the Western Parkland City Authority (WPCA, or the Authority) to achieve the vision for the Bradfield City and associated precinct. To better improve on the proposed masterplan for Bradfield, both the Department and Authority should consider the following recommendations:

Recommendations:

- 1. UDIA strongly urges the WPCA to make public their existing Memorandum of Understandings with investors who have made undertaking or committed to the Bradfield City, in order to further generate industry certainty and clarity within the Aerotropolis and across the Western Parkland City.**
- 2. UDIA strongly encourages the DPHI and WPCA to increase the maximum permissible heights and FSR ratios within the Precinct.**
- 3. UDIA strongly encourages the WPCA to clarify if any external research has been undertaken to adequately capture the jobs and skills needs of the growing Western Parkland City population and the ability for the Bradfield City to scale its development potential, in order to better capture the needs of a growing population.**
- 4. That the WPCA make adequate provision for the build and completion of the Southwest Rail Link Extension by 2031 and the full North-South Rail link by 2035.**
- 5. UDIA recommends the Masterplan provide greater clarity regarding the next stage of the process – the delivery and construction phase.**

- 6. UDIA recommends the WPCA provide a clearer scope of the development sequencing and timing within the Bradfield City Centre**
- 7. UDIA strongly encourages the WPCA, due it being the first master planned community leading the Aerotropolis' development, to focus funds toward local road and transport infrastructure.**
- 8. UDIA urges the WPCA to carefully consider the thresholds, locations and identified structures requiring design competitions and that all reasonable steps are taken to mitigate extensive and costly design processes.**

NextGen West Manifesto:

The UDIA's NextGen West platform is the summary of two years of work from UDIA's NextGen West Leadership Panel – represented by leaders from Local Government, State Government Agencies and the development industry. NextGen West represents the voice for GWS to ensure the region, cities and neighbourhoods emerge as desirable places to live and work. Implementation of our pillar recommendations, with the right investment and the right decisions that achieve better productivity and liveability outcomes, will ensure that Bradfield will emerge as a globally recognised growth area.

NextGen West identifies the six critical areas necessary to ensure that Aerotropolis and Western Parkland City contributes to Sydney's growth and global competitiveness. NextGen West is a strategy designed to improve regional access and ensure that informed decision-making by government leads to infrastructure coordination and a significant increase in amenity. UDIA recommends both the Department of Planning and the Western Parkland City Authority incorporate best practice thinking outlined in the six pillars of NextGen West when considering the masterplan. These pillars include:

- Developing essential Infrastructure that covers both city shaping and critical enabling infrastructure aimed at servicing future growth and better connections between commercial centres across the western suburbs.
- Placing downward pressure on housing affordability by ensuring the right balance of density and diversity across local government areas.
- Continue incorporating jobs and employment initiatives that create higher skilled jobs closer to home in Western Sydney.
- Simplify governance and planning pathways that assist the development industry in navigating planning decisions.
- Ensure environment and resilience measures are prioritised for communities to better withstand environmental challenges and which include biodiversity outcomes that are realistic, affordable, and achievable.

- Continue investment in social and cultural infrastructure to improve urban environments and public domain areas together with funding for arts and culture that will build upon the rich diversity in Western Sydney.

Executive Summary:

The WPCA Bradfield Masterplan should be applauded for its robust and well-considered Precinct, open space, community amenities and ambitious infrastructure. UDIA and its members note some key improvements could be made to better deliver for the future community of Bradfield and to provide greater certainty for industry in setting out the vision for the Bradfield City. UDIA members have raised concern regarding a lack of detail with some of the contents contained in the Masterplan and associated documentation, with several members indicating that certain parts are rehashed from previously distributed Department of Planning Aerotropolis Planning Package information. Similar Masterplans, currently under review by the Technical Assurance Panel (TAP) in the Aerotropolis by comparison have included 47 detailed technical reports and 257 detailed civil drawings (cross sections and elevations), detailing delivery and requirements compliance plans for areas in similar size to the Bradfield City (180 hectares and over 1 million square metres of warehouse, factory, hardstand and commercial offices). Members have also indicated that they need to better understand how the WPCA will sequence the delivery of infrastructure and transport connectivity with other areas across the Aerotropolis and Western Parkland City.

UDIA and its members are supportive of the successful development of Bradfield over the coming decades and industry have expressed an interest to better support and participate with investors to deliver the vision for Bradfield. Members are seeking greater clarity and understanding about the potential opportunities for private sector participation in the delivery of Bradfield. UDIA is also seeking a greater understanding pre commitments and undertaking made by existing Memorandums of Understanding from local and international investors in the Precinct. The UDIA notes that the Masterplan has not made any indication of these MOU's.

UDIA also supports the Masterplan stressing the need for more apartment capacity in the planning framework to cope with rising demand, as future public transport options open to the public over the next decade in and around the Western Parkland City and Aerotropolis.

Recommendation:

- **UDIA strongly urges the WPCA to make public their existing Memorandum of Understandings with investors who have made undertaking or committed to**

the Bradfield City, in order to further generate industry certainty and clarity within the Aerotropolis and across the Western Parkland City.

Realising the full potential of Bradfield:

The UDIA has taken time to consider if the Masterplan has adequately set ambitious targets for employment, housing, commercial and jobs growth. Whilst we understand that it has been prepared within the remit of the broader Aerotropolis planning framework, we consider the delivery of 20,000 – 24,000 jobs as being under ambitious for the City of Bradfield. For example, Parramatta has by contrast developed nearly 55,000 jobs to date and is still growing. The Western Parkland City Authority has outlined that it expects 8000 jobs and 3000 residents to be delivered by 2036, with total development within the precinct supplying circa 341,000 sqm of Gross Floor Area (GFA). By 2056, this figure is expected to increase to circa 24,000 jobs and 15,000 residents, with GFA totalling 1.25 million sqm under a maximum permissible building height limit of 62 metres. Table 17 of the Masterplan report indicates that from 2026, Bradfield will support between 1,000 and 1,200 jobs, with a site coverage of existing dwellings delivering circa 48,500 square metres of floor area. Unless these are construction jobs, this figure is impossible to achieve in the short timeframe outlined in the Masterplan, with jobs and resident figures rising considerably by 2036 to 8,300 jobs and 3,100 residents respectively. UDIA strongly encourages the Department of Planning and WPCA to increase the maximum permissible heights and FSR ratios within the Precinct, allowing for greater employment, residential and investment capacity within the City of Bradfield to meet the precincts potential over the coming decades of development. Bradfield is effectively capping its ability to develop jobs forever by requirements in the planning framework to not exceed proposed floorspace and height caps. In the UDIA's view Bradfield City has greater potential than what is reflected in the Masterplan, and this will inadvertently limit the scope and framework of the city for decades to come. Increasing heights and FSRs to support future residential and employment developments within the precinct will assist in delivering job generating assets which boost productivity, housing and community opportunity via access to skilled jobs and opportunities within close proximity to homes.

UDIA strongly encourages the WPCA to clarify if any external research has been undertaken to adequately capture the jobs and skills needs of the growing Western Parkland City population and the ability for the Bradfield City to scale its development potential, in order to better capture the needs of a growing population. Due to the timeline for development extending beyond 2056, UDIA and its members are concerned that the current master planning process may be exposed to external market, construction, economic and government factors, which may hinder its ability to deliver on the overall vision for the precinct. This is an incredibly long horizon given the intensity

of the \$1 billion in funding that was dedicated to developing the Bradfield CBD as a catalyst for surrounding growth in the Aerotropolis.

Recommendations:

- **UDIA strongly encourages the Department of Planning and WPCA to increase the maximum permissible heights and FSR ratios within the Precinct.**
- **UDIA strongly encourages the WPCA to clarify if any external research has been undertaken to adequately capture the jobs and skills needs of the growing Western Parkland City population and the ability for the Bradfield City to scale its development potential, in order to better capture the needs of a growing population.**
- **UDIA and its members strongly urge the WPCA and Planning to consider increasing floorspace and height caps.**

Transport Connectivity in Bradfield and the Aerotropolis:

The Western Parkland City and Bradfield centre more specifically is set to emerge as the third major city in Greater Sydney, with up to 184,500 new homes and 200,000 new jobs by 2036. Inadequate public transport is evident across the West, with on average 1 rail station per 30,000 people in Western Sydney, compared to 1 every 15,000 people in the Eastern suburbs. UDIA notes that the Bradfield Masterplan has detailed that there has been no decision as to whether the Bradfield Metro rail will be built with a tunnel or viaduct, as it traverses Thompson Creek.

The scale of public transport infrastructure needed to service Western Sydney is significant and will therefore take time to deliver. The obvious gaps in the current network in the Southwest growth precincts is the Leppington connection to the Aerotropolis and the North-South Metro line termination at Bradfield. While there are plans to join Leppington to Bradfield by rail, and to extend the Metro line from Bradfield to Macarthur via Oran Park and Narellan, there has been little commitment to timing or budget by the Government since its announcement in 2018.

The UDIA believes that the WPCA should support the southern extension of the Metro line from Bradfield to Leppington and to Oran Park, as part of its Master planning, in order to better serve the substantial population growth being realised in this part of Western Sydney. Extensive residential and employment areas will be opened east and west of the Northern Road in the next decade, adding to existing residential and employment populations. While there is a commitment to investigate extending the Metro rail network from Bradfield to Leppington, there is no such commitment for any southern extension of

the route to Oran Park and beyond. The scale of public transport infrastructure needed to service Western Sydney is significant and will therefore take time to deliver. However, integrated land use planning along already protected rail corridors should commence immediately, so that landowners and developers have the certainty required to plan for long lead time projects, but more importantly so that community benefits from the eventual delivery of the infrastructure can be maximised. Strategic planning for both the major rail projects in Southwest Sydney should commence immediately, with a strong focus on driving housing supply to address the existing and future housing shortages, and to ensure that a network of rail-based centres can be delivered over time to meet the needs of growing communities across the Aerotropolis and Western Parkland City.

Recommendation:

- **That the Western Parkland City Authority make adequate provision for the build and completion of the Southwest Rail Link Extension by 2031 and the full North-South Rail link by 2035.**

Bradfield Masterplan Infrastructure Delivery:

Since the Federal Government's announcement of the Western Sydney Airport in 2014, the Government's vision of the land surrounding the airport has been detailed in several plans, policies, and environmental planning instruments (EPIs). UDIA members have raised concerns regarding the documentation on infrastructure delivery contained within the Masterplan package. Many members have outlined that the current document is vague, reflecting the evolving nature of the contribution's framework (draft s7.11 plan at Liverpool City Council, transition from SIC to HPC in 2026, and exemptions from the 2% train station precinct surcharge on the SIC). Adjoining landowners are calling for greater confidence to source partnership opportunities within Bradfield and UDIA therefore calls on the WPCA to demonstrate greater leadership within government to align their masterplan with the evolving and changing landscape of infrastructure delivery. UDIA recommends the Western Parkland City Authority provide a clearer scope of the development sequencing and timing within the Bradfield City Centre, as this will assist neighboring developers and landowner within the Aerotropolis and surrounding Western Sydney growth precincts. The staging discussion in the exhibited material by the WPCA is very broad and industry believes that more work can be done to further enhance the plan ahead of its finalization.

Recommendations:

- **UDIA recommends the Masterplan provide greater clarity regarding the next stage of the process – the delivery and construction phase.**
- **UDIA recommends the Western Parkland City Authority provide a clearer scope of the development sequencing and timing within the Bradfield City Centre.**

Contributions, Fees and Charges:

The WPCA have detailed that they wish to apply the Housing and Productivity Contribution fees toward open space and tree canopy coverage. Industry feels this is a wasted opportunity which would be better focussed on the upgrade of vital road infrastructure such as Badgerys Creek Road, which in turn will further accelerate investment in Bradfield with immediate effect.

One of the WPCA's top priorities listed in Table 19, is the Metrolink Boulevard. UDIA believes that greater attention could turn to other infrastructure within the Bradfield Precinct, as neighbouring developments benefiting from the Metrolink not slated to occur for several years and the Eastern Ring Road (ERR) is several years away from being constructed according to Transport for New South Wales (TfNSW). UDIA strongly encourages the WPCA, due it being the first master planned community leading the Aerotropolis' development, to focus funds on local road and transport infrastructure.

As part of the masterplan process and documentation, the WPCA have also outlined that the NSW Government and council is owed a total of \$26 million, as part of fees incurred via SIC and Local Council Contributions (s7.12). UDIA notes that the figures contained in the Masterplan for s7.12 contribution fees have not been calculated since Liverpool City Council's 4.5% development cost proposal was still a draft figure at the time of preparing the report. The WPCA have also failed to calculate their Housing and Productivity Contribution, since it does not currently apply (SIC converts to HPC on 1 July 2026), even though it will in the future. UDIA feels the WPCA and broader industry would benefit from greater transparency and up to date reporting as part of the Masterplan and therefore encourages the WPCA to update figures in line with recent government announcements and changes to existing fee arrangements with council.

Recommendations:

- **UDIA strongly encourages the WPCA, due it being the first master planned community leading the Aerotropolis' development, to focus funds toward local road and transport infrastructure.**

Design Excellence Requirements:

The Masterplan report includes design excellence requirements for several development sites within the City of Bradfield. UDIA urges the WPCA and Department of Planning to consider whether the proposed requirements could result in overlapping design competitions or competing requirements and encourages careful consideration as to the thresholds and locations currently included in the design excellence strategy. Any review panels should be principle based to mitigate extensive and costly design processes which may have the outcome of delaying development. Whilst these controls can be well meaning and designed to mitigate poor design outcomes, they have little regard to development feasibility and can sometimes stifle development adding time and cost. Often design excellence panels have very conflicting opinions based on personal preferences rather than agreed standards. This can mean money and time are wasted on consultants needing to redesign plans, as well as the cost of the panels themselves. UDIA urges the WPCA to carefully consider the thresholds, locations and identified structures requiring design competitions and that all reasonable steps are taken to mitigate extensive and costly design processes.

Recommendation:

- **UDIA urges the WPCA to carefully consider the thresholds, locations and identified structures requiring design competitions and that all reasonable steps are taken to mitigate extensive and costly design processes.**

Conclusion

UDIA members want the City of Bradfield's vision to fully develop over the coming years. The broader Aerotropolis and Western Sydney region would benefit from greater cooperation and partnership between Government and the private sector. Coordinating the delivery of priority road, water and public transport infrastructure in order to unlock much needed development, including areas surrounding Bradfield are necessary. A combination of current supply shortages, expensive operating conditions, slow progress in delivering serviced land, and complex governance arrangements has led to low investment confidence. Fortunately, the Aerotropolis is made of large landholdings and a motivated private sector that can offer expertise and experience to implement the vision and present opportunities for partnerships. With major planning policies for the Aerotropolis now completed, industry is keen to shift the focus to the delivery phase.

The WPCA should be applauded for their robust and well-considered Precinct masterplan, associated infrastructure and other plans. The recommendations outlined in our submission, will assist in developing the City of Bradfield.

Please reach out to **Director – Greater Western Sydney, Charles Kekovich** at ckekovich@udiansw.com.au or call via 0409 776 588 if you would like to discuss these matters further.

Kind regards,

A handwritten signature in black ink, appearing to read 'G. Melvin', with a long, sweeping horizontal stroke underneath.

Gavin Melvin
Acting Chief Executive Officer
UDIA NSW